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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No.: 3:20-cr-00012-TMB-DMS-3
	)	
KEVIN GLOVER, et al,	)	
	)	
Defendants.	)	<b>DECLARATION OF JEREMEY</b>
	)	<b>HOUGH</b>

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I, Jeremy Hough, declare under penalty of perjury that the following is true and correct:

1. I am the Director of Institutions for the Department of Corrections ("DOC") of the State of Alaska. My answers to the court's remaining questions for DOC, after the most recent hearing regarding attorney and discovery access for federal inmates, are set forth below.

2. *"How many segregation cells are used in quarantine both at ACC east and west?"*

As of today, 96 housing cells are used for quarantine in ACC East's general population areas. The total in ACC West fluctuates daily, but currently the total is nine booking cells and nine maximum segregation cells. We can accommodate more if the number of intakes rises.

3. *"And how many rooms in both facilities provide private attorney calls?"*

There are six private attorney call rooms; two west and four east. These were previously the attorney contact visitation rooms. The hours of operation are 8 AM-9 PM Monday-Friday and 9 AM-5 PM Saturday and Sunday. They are not being used to capacity.

4. *How many discovery computers are available? Where they are located?*

There are eight non-networked discovery computers currently set up. They are split evenly between ACC East and ACC West. More have been purchased, and when brought on line will make a total of sixteen.

There are two additional video conference attorney computers for the review of discovery, one each in ACC West and ACC East. DOC has purchased more and is in the process of setting them up. When they are brought on line, the total of such computers will be twelve.

There are five additional Polycom units that the court allows attorneys to use on a case by case basis for review of discovery. These are split between east and west. There is a sixth that is currently inoperable, but it is expected that the Courts will get it back on

line soon. Once the sixth Polycom is back on line, there will be three each in ACC East and ACC West.

5. *How many are in a room with more than one computer? And where we have this protective order problem, how many are connected to printers?*

All discovery is viewed in private rooms. The law libraries are shut down to one offender at a time for discovery review. There are no discovery computers with the ability to print.

6. *The number of inmates and the number of federal inmates at both ACC east and west.*

There are 59 federal inmates in ACC East and 57 in ACC West.

7. *The number of phones in the phone banks and how close together are they?*

This is a difficult question to answer because DOC does not keep this information on hand, and it is not standardized. However, within ACC, the most common scenario is that there are four phones to a bank, and they are separated by a barrier approximately 2 feet from each other. Because of the proximity of the phones and the openness of the setting, DOC does not believe that the phone banks are suitable for attorney calls that an inmate wishes to keep confidential.

8. *Are the new computers that are being brought on-line adequate for the number of people who may be trying to use them?*

Even without the new computers being brought online, the current set of computers are not being used to capacity, and have a considerable amount of capacity

remaining, with regard to available time slots. The new computers will add to that capacity. While it is impossible to say for certain whether the new capacity will be adequate to meet an increase in requests for use, DOC has added what it has estimated will be an adequate number of computers for inmates to review discovery and meet with counsel.

9. The above is true to the best of my knowledge.

By: Jeremy Hough 09/08/2020  
Jeremy Hough Date

Declarations have the same legal force as affidavits. 28 U.S.C. § 1746.

Certificate of Service

I hereby certify that on September 8, 2020, I caused the foregoing to be electronically filed with the Clerk of Court, United States District Court for the District of Alaska using the CM/ECF system. All participants in this case are registered CM/ECF users and will be served by the district's CM/ECF system. The foregoing **Declaration of Jeremy Hough** was served electronically on:

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